## EXHIBIT 4

## UNITED STATES OF AMERICA BEFORE THE FEDERAL TRADE COMMISSION WASHINGTON D.C.

In the Matter of

UNION OIL COMPANY OF CALIFORNIA, a corporation.

Docket No. 9305

## NOTICE OF VIDEOTAPED DEPOSITIONS OF CALIFORNIA AIR RESOURCES BOARD AND OF PETER VENTURINI AND MICHAEL KENNY

PLEASE TAKE NOTICE, that pursuant to Rule 3.33 (c) and 3.36 of the Federal Trade Commission's Rules of Practice for Adjudicative Proceedings (16 C.F.R. §§3.33 (c) and 3.36), Respondent's Counsel will take the deposition of California Air Resources Board ("CARB") and/or the CARB staff by one or more officers, directors, or managing agents, or other persons who are designated to testify on their behalf as to matters known or reasonably available to it on the topics described below. These deponents have been identified by CARB's counsel to be Peter Venturini and Michael Kenny.

Additionally, the individual depositions of Peter Venturini and Michael Kenny (not restricted to these topics) will be taken during this time.

These depositions will be conducted before some person authorized by law to administer oaths, and will continue from day to day until completed. The testimony will be recorded by stenographic means and by videotape. The testimony will be taken at a designated conference room at the Hyatt Regency Hotel, 1209 L Street, Sacramento, California, beginning on May 13, 2003 at 9:00 a.m., beginning with Mr. Venturini.

## TOPICS ON WHICH DESIGNATED CARB WITNESS WILL TESTIFY

(1) All facts and documents which evidence or reflect that Unocal committed fraud upon the California Air Resources Board and/or the California Air Resources Board's staff before, during or after the adoption of CARB's Phase 2 rulemaking on reformulated gasoline in 1991.

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- (2) With respect to the Phase 2 rulemaking on reformulated gasoline, the statutory and/or regulatory basis used by CARB and/or CARB staff to propose and adopt Phase 2 Regulations for reformulated gasoline in 1991 and any later adopted amendments to those regulations.
- (3) For each fraudulent act identified by you in response to the request in paragraph (1) above, the actions which CARB staff and/or CARB would or would not have taken in 1991, 1992, 1993, 1994 if the act identified by you had not occurred.
- (4) The reasons and basis for CARB staff's proposals for and CARB's adoption of Phase 2 Regulations for reformulated gasoline, any amendments thereto including the 1994 Predictive Model and the Phase 3 Regulations for reformulated gasoline, including without limitation the reasons and basis for the T50 specification contained therein.

Dated: April 21, 2003.

Respectfully submitted,

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